

EXHIBIT

1

Malhi, Jaywin (CRT)

From: Taylor Meehan <taylor@consovoymccarthy.com>
Sent: Friday, May 26, 2023 10:17 AM
To: Kathleen Hunker; Nickolas Spencer; Malhi, Jaywin (CRT); Christopher Hilton; Zachary Berg; Munera Al-Fuhaid; Ryan Kercher; Jessica Yvarra; Elizabeth Saunders; Sharon Murray; frank@consovoymccarthy.com; patrick@consovoymccarthy.com
Cc: Mellett, Timothy F (CRT); Freeman, Daniel (CRT); Rupp, Michelle (CRT); Anderson, Jacki (CRT); Lott, Jasmin (CRT); Berlin, Holly (CRT); Chad Dunn; Noor Taj; Ezra Rosenberg; Kenneth Parreno; Nina Perales; Pooja Chaudhuri; Sofia Fernandez Gold; Sean McCaffity; Tex Quesada; Martin Golando; ddonatti@aclutx.org; tbuser-clancy@aclutx.org; Jerry Vattamala; pstege@aaldef.org; Mitchell D. Brown; aharris@aclutx.org; slorenzo-giguere@aaldef.org; lindsey.cohan@dechert.com; Steiner, Neil; Robert@notzonlaw.com; Mark Gaber; gainesjesse@ymail.com; David Fox; rhicks@renea-hicks.com; abranch@elias.law; Brooklynn Morris; Julia Longoria; Fatima Menendez; jgonzalez@malc.org
Subject: [EXTERNAL] Re: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Thanks very much, Jaywin. We consent on behalf of the third-party legislators in the House.

From: Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>
Date: Friday, May 26, 2023 at 8:46 AM
To: Nickolas Spencer <nas@naslegal.com>, "Malhi, Jaywin (CRT)" <Jaywin.Malhi@usdoj.gov>, Taylor Meehan <taylor@consovoymccarthy.com>, Christopher Hilton <Christopher.Hilton@oag.texas.gov>, Zachary Berg <Zachary.Berg@oag.texas.gov>, Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>, Ryan Kercher <Ryan.Kercher@oag.texas.gov>, Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>, Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>, Sharon Murray <Sharon.Murray@oag.texas.gov>, "frank@consovoymccarthy.com" <Frank@consovoymccarthy.com>, "patrick@consovoymccarthy.com" <patrick@consovoymccarthy.com>
Cc: "Mellett, Timothy F (CRT)" <Timothy.F.Mellett@usdoj.gov>, "Freeman, Daniel (CRT)" <Daniel.Freeman@usdoj.gov>, "Rupp, Michelle (CRT)" <Michelle.Rupp@usdoj.gov>, "Anderson, Jacki (CRT)" <Jacki.Anderson@usdoj.gov>, "Lott, Jasmin (CRT)" <Jasmin.Lott@usdoj.gov>, "Berlin, Holly (CRT)" <Holly.Berlin@usdoj.gov>, Chad Dunn <chad@brazilanddunn.com>, Noor Taj <noor@scsj.org>, Ezra Rosenberg <erosenberg@lawyerscommittee.org>, Kenneth Parreno <Kparreno@maldef.org>, Nina Perales <nperales@maldef.org>, Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>, Sofia Fernandez Gold <sfgold@lawyerscommittee.org>, Sean McCaffity <SMcCaffity@textrial.com>, Tex Quesada <Quesada@textrial.com>, Martin Golando <martin.golando@gmail.com>, "ddonatti@aclutx.org" <ddonatti@aclutx.org>, "tbuser-clancy@aclutx.org" <tbuser-clancy@aclutx.org>, Jerry Vattamala <jvattamala@aaldef.org>, "pstege@aaldef.org" <pstege@aaldef.org>, "Mitchell D. Brown" <mitchellbrown@scsj.org>, "aharris@aclutx.org" <aharris@aclutx.org>, "slorenzo-giguere@aaldef.org" <slorenzo-giguere@aaldef.org>, "lindsey.cohan@dechert.com" <lindsey.cohan@dechert.com>, "Steiner, Neil" <neil.steiner@dechert.com>, "Robert@notzonlaw.com" <Robert@notzonlaw.com>, Mark Gaber <mark@markgaber.com>, "gainesjesse@ymail.com" <gainesjesse@ymail.com>, David Fox <dfox@elias.law>, "rhicks@renea-hicks.com" <rhicks@renea-hicks.com>, "abranch@elias.law" <abranch@elias.law>, Brooklynn Morris <bmorris@thebledsoelawfirm.com>, Julia Longoria <Jlongoria@maldef.org>, Fatima Menendez

<fmenendez@maldef.org>, "jgonzalez@malc.org" <jgonzalez@malc.org>

Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

State Defendants also consent.

Kathleen Hunker

Special Litigation Unit
Office of the Attorney General of Texas
209 W. 14th Street
Austin, TX 78711
512-936-2275
Kathleen.Hunker@oag.texas.gov

From: Nickolas Spencer <nas@naslegal.com>

Sent: Friday, May 26, 2023 7:19 AM

To: Malhi, Jaywin (CRT) <Jaywin.Malhi@usdoj.gov>; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Taylor Meehan <taylor@consovoymccarthy.com>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>; Ryan Kercher <Ryan.Kercher@oag.texas.gov>; Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>; Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>; Sharon Murray <Sharon.Murray@oag.texas.gov>; frank@consovoymccarthy.com; patrick@consovoymccarthy.com

Cc: Mellett, Timothy F (CRT) <Timothy.F.Mellett@usdoj.gov>; Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Rupp, Michelle (CRT) <Michelle.Rupp@usdoj.gov>; Anderson, Jacki (CRT) <Jacki.Anderson@usdoj.gov>; Lott, Jasmin (CRT) <Jasmin.Lott@usdoj.gov>; Berlin, Holly (CRT) <Holly.Berlin@usdoj.gov>; Chad Dunn <chad@brazilanddunn.com>; Noor Taj <noor@scsj.org>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Kenneth Parreno <Kparreno@maldef.org>; Nina Perales <nperales@maldef.org>; Pooja Chaudhuri <cpchaudhuri@lawyerscommittee.org>; Sofia Fernandez Gold <sfgold@lawyerscommittee.org>; Sean McCaffity <SMMcCaffity@textrial.com>; Tex Quesada <Quesada@textrial.com>; Martin Golando <martin.golando@gmail.com>; ddonatti@aclutx.org; tbuser-clancy@aclutx.org; Jerry Vattamala <jvattamala@aaldef.org>; pstege@aaldef.org; Mitchell D. Brown <mitchellbrown@scsj.org>; aharris@aclutx.org; slorenzo-giguere@aaldef.org; lindsey.cohan@dechert.com; Steiner, Neil <neil.steiner@dechert.com>; Robert@notzonlaw.com; Mark Gaber <mark@markgaber.com>; gainesjesse@ymail.com; David Fox <dfox@elias.law>; rhicks@reneahicks.com; abranch@elias.law; Brooklynn Morris <bmorris@thebledsoelawfirm.com>; Julia Longoria <Jlongoria@maldef.org>; Fatima Menendez <fmenendez@maldef.org>; jgonzalez@malc.org

Subject: Re: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Intervenors are good with it.

Nickolas A. Spencer, J.D., MA.

Attorney and Counselor at Law

Spencer & Associates, PLLC.

9100 Southwest Freeway, Suite 122

Houston, TX 77074

nas@naslegal.com

[713-863-1409](tel:713-863-1409)

From: Malhi, Jaywin (CRT) <Jaywin.Malhi@usdoj.gov>

Sent: Friday, May 26, 2023 7:07:16 AM

To: Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Taylor Meehan <taylor@consovoymccarthy.com>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>; Ryan Kercher <Ryan.Kercher@oag.texas.gov>; Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>; Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>; Sharon Murray

<Sharon.Murray@oag.texas.gov>; frank@consovoymccarthy.com <Frank@consovoymccarthy.com>;
patrick@consovoymccarthy.com <patrick@consovoymccarthy.com>

Cc: Mellett, Timothy F (CRT) <Timothy.F.Mellett@usdoj.gov>; Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Rupp, Michelle (CRT) <Michelle.Rupp@usdoj.gov>; Anderson, Jacki (CRT) <Jacki.Anderson@usdoj.gov>; Lott, Jasmin (CRT) <Jasmin.Lott@usdoj.gov>; Berlin, Holly (CRT) <Holly.Berlin@usdoj.gov>; Chad Dunn <chad@brazilanddunn.com>; Noor Taj <noor@scsj.org>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Kenneth Parreno <Kparreno@maldef.org>; Nickolas Spencer <nas@naslegal.com>; Nina Perales <nperales@maldef.org>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; Sofia Fernandez Gold <sfgold@lawyerscommittee.org>; Sean McCaffity <SMcCaffity@textrial.com>; Tex Quesada <Quesada@textrial.com>; Martin Golando <martin.golando@gmail.com>; ddonatti@aclutx.org <ddonatti@aclutx.org>; tbuser-clancy@aclutx.org <tbuser-clancy@aclutx.org>; Jerry Vattamala <jvattamala@aaldef.org>; pstegemoeller@aaldef.org <pstegemoeller@aaldef.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; aharris@aclutx.org <aharris@aclutx.org>; slorenzo-giguere@aaldef.org <slorenzo-giguere@aaldef.org>; lindsey.cohan@dechert.com <lindsey.cohan@dechert.com>; Steiner, Neil <neil.steiner@dechert.com>; Robert@notzonlaw.com <Robert@notzonlaw.com>; Mark Gaber <mark@markgaber.com>; gainesjesse@ymail.com <gainesjesse@ymail.com>; David Fox <dfox@elias.law>; rhicks@renea-hicks.com <rhicks@renea-hicks.com>; abranch@elias.law <abranch@elias.law>; Brooklynn Morris <bmorris@thebledsoelawfirm.com>; Julia Longoria <Jlongoria@maldef.org>; Fatima Menendez <fmenendez@maldef.org>; jgonzalez@malc.org <jgonzalez@malc.org>

Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Counsel:

Attached are revised drafts of the joint motion and proposed order, which drafts now include a reply deadline of August 11. Do we have your sign off? Upon hearing from you, we'll plug in the placeholders and file soon thereafter. Thanks.

Jaywin Singh Malhi
Trial Attorney
Voting Section, Civil Rights Division
United States Department of Justice
jaywin.malhi@usdoj.gov
(202) 598-0146

From: Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>
Sent: Wednesday, May 24, 2023 1:53 PM
To: Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Taylor Meehan <taylor@consovoymccarthy.com>; Chad Dunn <chad@brazilanddunn.com>; Noor Taj <noor@scsj.org>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Kenneth Parreno <Kparreno@maldef.org>; Nickolas Spencer <nas@naslegal.com>; Nina Perales <nperales@maldef.org>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; Sofia Fernandez Gold <sfgold@lawyerscommittee.org>; Sean McCaffity <SMcCaffity@textrial.com>; Tex Quesada <Quesada@textrial.com>; Martin Golando <martin.golando@gmail.com>; ddonatti@aclutx.org <ddonatti@aclutx.org>; tbuser-clancy@aclutx.org <tbuser-clancy@aclutx.org>; Jerry Vattamala <jvattamala@aaldef.org>; pstegemoeller@aaldef.org <pstegemoeller@aaldef.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; aharris@aclutx.org <aharris@aclutx.org>; slorenzo-giguere@aaldef.org <slorenzo-giguere@aaldef.org>; lindsey.cohan@dechert.com <lindsey.cohan@dechert.com>; Steiner, Neil <neil.steiner@dechert.com>; Robert@notzonlaw.com <Robert@notzonlaw.com>; Mark Gaber <mark@markgaber.com>; gainesjesse@ymail.com <gainesjesse@ymail.com>; David Fox <dfox@elias.law>; rhicks@renea-hicks.com <rhicks@renea-hicks.com>; abranch@elias.law <[abrand@elias.law](mailto:abranch@elias.law)>; Brooklynn Morris <bmorris@thebledsoelawfirm.com>; Lott, Jasmin (CRT) <Jasmin.Lott@usdoj.gov>; Mellett, Timothy F (CRT) <Timothy.F.Mellett@usdoj.gov>; Rupp, Michelle (CRT) <Michelle.Rupp@usdoj.gov>; Anderson, Jacki (CRT) <Jacki.Anderson@usdoj.gov>; Berlin, Holly (CRT) <Holly.Berlin@usdoj.gov>; Malhi, Jaywin (CRT) <Jaywin.Malhi@usdoj.gov>; Julia Longoria <Jlongoria@maldef.org>; Fatima Menendez <fmenendez@maldef.org>; jgonzalez@malc.org; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>; Ryan Kercher <Ryan.Kercher@oag.texas.gov>; Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>; Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>; Sharon Murray <Sharon.Murray@oag.texas.gov>;

frank@consovoymccarthy.com; patrick@consovoymccarthy.com

Subject: [EXTERNAL] RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Dan,

This email is to confirm our agreement with Taylor's proposal.

Kathleen Hunker

Special Litigation Unit
Office of the Attorney General of Texas
209 W. 14th Street
Austin, TX 78711
512-936-2275
Kathleen.Hunker@oag.texas.gov

From: Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>

Sent: Wednesday, May 24, 2023 12:48 PM

To: Taylor Meehan <taylor@consovoymccarthy.com>; Chad Dunn <chad@brazilanddunn.com>; Noor Taj <noor@scsj.org>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Kenneth Parreno <Kparreno@maldef.org>; Nickolas Spencer <nas@naslegal.com>; Nina Perales <nperales@maldef.org>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; Sofia Fernandez Gold <sfgold@lawyerscommittee.org>; Sean McCaffity <SMcCaffity@textrial.com>; Tex Quesada <Quesada@textrial.com>; Martin Golando <martin.golando@gmail.com>; ddonatti@aclutx.org; tbuser-clancy@aclutx.org; Jerry Vattamala <jvattamala@aaldef.org>; pstegemoeller@aaldef.org; Mitchell D. Brown <mitchellbrown@scsj.org>; aharris@aclutx.org; slorenzo-giguere@aaldef.org; lindsey.cohan@dechert.com; Steiner, Neil <neil.steiner@dechert.com>; Robert@notzonlaw.com; Mark Gaber <mark@markgaber.com>; gainesjesse@ymail.com; David Fox <dfox@elias.law>; rhicks@renea-hicks.com; abranch@elias.law; Brooklynn Morris <bmorris@thebledsoelawfirm.com>; Lott, Jasmin (CRT) <Jasmin.Lott@usdoj.gov>; Mellett, Timothy F (CRT) <Timothy.F.Mellett@usdoj.gov>; Rupp, Michelle (CRT) <Michelle.Rupp@usdoj.gov>; Anderson, Jacki (CRT) <Jacki.Anderson@usdoj.gov>; Berlin, Holly (CRT) <Holly.Berlin@usdoj.gov>; Malhi, Jaywin (CRT) <Jaywin.Malhi@usdoj.gov>; Julia Longoria <Jlongoria@maldef.org>; Fatima Menendez <fmenendez@maldef.org>; igonzalez@malc.org; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>; Ryan Kercher <Ryan.Kercher@oag.texas.gov>; Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>; Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>; Sharon Murray <Sharon.Murray@oag.texas.gov>; frank@consovoymccarthy.com; patrick@consovoymccarthy.com

Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Thanks very much Taylor. We will discuss your proposal and an appropriate reply deadline with the Private Plaintiffs and then get back to you.

Dan

From: Taylor Meehan <taylor@consovoymccarthy.com>

Sent: Wednesday, May 24, 2023 1:45 PM

To: Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>; Chad Dunn <chad@brazilanddunn.com>; Noor Taj <noor@scsj.org>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Kenneth Parreno <Kparreno@maldef.org>; Nickolas Spencer <nas@naslegal.com>; Nina Perales <nperales@maldef.org>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; Sofia Fernandez Gold <sfgold@lawyerscommittee.org>; Sean McCaffity <SMcCaffity@textrial.com>; Tex Quesada <Quesada@textrial.com>; Martin Golando <martin.golando@gmail.com>; ddonatti@aclutx.org; tbuser-clancy@aclutx.org; Jerry Vattamala <jvattamala@aaldef.org>; pstegemoeller@aaldef.org; Mitchell D. Brown <mitchellbrown@scsj.org>; aharris@aclutx.org; slorenzo-giguere@aaldef.org; lindsey.cohan@dechert.com; Steiner, Neil <neil.steiner@dechert.com>; Robert@notzonlaw.com; Mark Gaber <mark@markgaber.com>; gainesjesse@ymail.com; David Fox <dfox@elias.law>; rhicks@renea-hicks.com;

abranch@elias.law; Brooklynn Morris <bmorris@thebledsoelawfirm.com>; Lott, Jasmin (CRT) <Jasmin.Lott@usdoj.gov>; Mellett, Timothy F (CRT) <Timothy.F.Mellett@usdoj.gov>; Rupp, Michelle (CRT) <Michelle.Rupp@usdoj.gov>; Anderson, Jacki (CRT) <Jacki.Anderson@usdoj.gov>; Berlin, Holly (CRT) <Holly.Berlin@usdoj.gov>; Malhi, Jaywin (CRT) <Jaywin.Malhi@usdoj.gov>; Julia Longoria <Jlongoria@maldef.org>; Fatima Menendez <fmenendez@maldef.org>; jgonzalez@malc.org; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Christopher Hilton <Christopher.Hilton@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>; Ryan Kercher <Ryan.Kercher@oag.texas.gov>; Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>; Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>; Sharon Murray <Sharon.Murray@oag.texas.gov>; frank@consovoymccarthy.com; patrick@consovoymccarthy.com

Subject: [EXTERNAL] Re: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Thanks, Dan.

I believe this should work for us, and Texas OAG counsel can confirm as well.

We'd propose a July 28 response (mirroring the time between *Hughes* and June 23). We'd be happy to find a time to discuss further by phone if you think necessary.

Thanks,
Taylor

Taylor Meehan
Consovoy McCarthy PLLC
317.408.3650 (cell)
www.consovoymccarthy.com

This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

From: "Freeman, Daniel (CRT)" <Daniel.Freeman@usdoj.gov>
Date: Tuesday, May 23, 2023 at 8:49 AM
To: Chad Dunn <chad@brazilanddunn.com>, Noor Taj <noor@scsj.org>, Ezra Rosenberg <erosenberg@lawyerscommittee.org>, Kenneth Parreno <Kparreno@maldef.org>, Nickolas Spencer <nas@naslegal.com>, Nina Perales <nperales@maldef.org>, Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>, Sofia Fernandez Gold <sfgold@lawyerscommittee.org>, Sean McCaffity <SMcCaffity@textrial.com>, Tex Quesada <Quesada@textrial.com>, Martin Golando <martin.golando@gmail.com>, "ddonatti@aclutx.org" <ddonatti@aclutx.org>, "tbuser-clancy@aclutx.org" <tbuser-clancy@aclutx.org>, Jerry Vattamala <jvattamala@aaldef.org>, "pstegemoeller@aaldef.org" <pstegemoeller@aaldef.org>, "Mitchell D. Brown" <mitchellbrown@scsj.org>, "aharris@aclutx.org" <aharris@aclutx.org>, "slorenzo-giguere@aaldef.org" <slorenzo-giguere@aaldef.org>, "lindsey.cohan@dechert.com" <lindsey.cohan@dechert.com>, "Steiner, Neil" <neil.steiner@dechert.com>, "Robert@notzonlaw.com" <Robert@notzonlaw.com>, Mark Gaber <mark@markgaber.com>, "gainesjesse@ymail.com" <gainesjesse@ymail.com>, David Fox <dfox@elias.law>, "rhicks@reneahicks.com" <rhicks@reneahicks.com>, "abranch@elias.law" <abranch@elias.law>, Brooklynn Morris <bmorris@thebledsoelawfirm.com>, "Lott, Jasmin (CRT)" <Jasmin.Lott@usdoj.gov>, "Mellett, Timothy F (CRT)" <Timothy.F.Mellett@usdoj.gov>, "Rupp, Michelle (CRT)" <Michelle.Rupp@usdoj.gov>, "Anderson, Jacki (CRT)" <Jacki.Anderson@usdoj.gov>, "Berlin, Holly (CRT)" <Holly.Berlin@usdoj.gov>, "Malhi, Jaywin (CRT)" <Jaywin.Malhi@usdoj.gov>

<Jaywin.Malhi@usdoj.gov>, Julia Longoria <Jlongoria@maldef.org>, Fatima Menendez <fmenendez@maldef.org>, "jgonzalez@malc.org" <jgonzalez@malc.org>, Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>, Christopher Hilton <Christopher.Hilton@oag.texas.gov>, Zachary Berg <Zachary.Berg@oag.texas.gov>, Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>, Ryan Kercher <Ryan.Kercher@oag.texas.gov>, Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>, Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>, Sharon Murray <Sharon.Murray@oag.texas.gov>, Taylor Meehan <taylor@consovoymccarthy.com>, "frank@consovoymccarthy.com" <Frank@consovoymccarthy.com>, "patrick@consovoymccarthy.com" <patrick@consovoymccarthy.com>

Subject: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Counsel:

Attached please find a proposed joint motion regarding supplemental briefing on pending discovery motions in light of the Fifth Circuit's decision in *LULAC Texas v. Hughes*, along with a proposed order. Please let us know when you are available to confer in the next few days, including regarding dates to be inserted in these papers.

Thank you,

Dan

Daniel J. Freeman
Trial Attorney
Voting Section, Civil Rights Division
U.S. Department of Justice
4 Constitution Square
150 M Street NE, Room 8.143
Washington, DC 20530
(202) 305-4355 (o), (202) 305-5451 (c)
daniel.freeman@usdoj.gov